

IN THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

RECEIVED

2004 OCT 18 PM 2:10

IN RE:

PETITION FOR EXEMPTION OF
CERTAIN SERVICES

)
)
)
)
)
)

T.R.A. DOCKET ROOM

DOCKET NO. 03-00391

CONSUMER ADVOCATE AND PROTECTION DIVISION'S SUPPLEMENTAL
RESPONSE TO BELL SOUTH'S INTERROGATORY NO. 9


Paul G. Summers, Attorney General and Reporter for the State of Tennessee, through the Consumer Advocate and Protection Division of the Office of the Attorney General ("Consumer Advocate"), pursuant to the Order of the Hearing Officer entered on October 13, 2004, respectfully submits its supplemental response to Interrogatory No. 9 propounded by BellSouth Telecommunications, Inc. ("BellSouth"). In the October 13th Order, the Hearing Officer orders the Consumer Advocate to supplement its response to "fully respond to Interrogatory No. 9 and identify all services it believes provide end users with similar functionality to that provided by PRI." Order at 7. Accordingly, the Consumer Advocate supplements its response as follows:

BellSouth's Interrogatory No. 9: Please identify all services that you believe provide end users with similar functionality to that provided by PRI.

Consumer Advocate's Supplemental Response: The Consumer Advocate maintains its objections to this interrogatory. Without waiving its objections, the Consumer Advocate states that it has not identified any service that it believes provide end users with similar functionality to that provided by PRI.

RESPECTFULLY SUBMITTED,

PAUL G. SUMMERS, B.P.R. #6285
Attorney General and Reporter



JOE SHIRLEY, B.P.R. #022287
Assistant Attorney General
Office of the Attorney General
Consumer Advocate and Protection Division
P.O. Box 20207
Nashville, Tennessee 37202
(615) 532-2590

Dated: October 18, 2004

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via first-class U.S. Mail, postage prepaid, on October 18, 2004, upon:

Joelle Phillips, Esq.
BellSouth Telecommunications, Inc.
333 Commerce Street, Suite 2101
Nashville, Tennessee 37201-3300
Facsimile: 615-214-7406

Guilford F. Thornton, Jr., Esq.
Stokes, Bartholomew, Evans & Petree
424 Church Street, Suite 2800
Nashville, Tennessee 37219-2386
Facsimile: 615-687-1507

Henry Walker, Esq.
Boult, Cummings, Conners & Berry
414 Union Street, Suite 1600
Nashville, Tennessee 37219
Facsimile: 615-252-6363

Martha M. Ross-Bain, Esq.
AT&T Communications of the South, LLC
1200 Peachtree Street, NE, Suite 8062
Atlanta, Georgia 30309

Charles B. Welch, Jr., Esq.
Farris, Mathews, Branan, Bobango & Hellen
618 Church Street, Suite 300
Nashville, Tennessee 37219
Facsimile: 615-726-1776

Edward Phillips, Esq.
United Telephone-Southeast, Inc.
14111 Capital Boulevard
Wake Forest, North Carolina 27587-5900
Facsimile: 919-554-7913



JOE SHIRLEY
Assistant Attorney General

79487